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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

JORGE RODRIGUEZ-MEDINA, and

JOSE MANUEL SANCHEZ-LOBO,

Defendants.

Case No.: 2:24-mj-00195-BNW

**Stipulation to Extend Deadlines to  
Conduct Preliminary Hearing and  
File Indictment (First Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, and Jean N. Ripley, Assistant United States Attorney, counsel for the United States of America; Rene L. Valladares, Federal Public Defender, and LaRonda R. Martin, Assistant Federal Public Defender, counsel for defendant Jose Manuel Sanchez-Lobo; and Robert Draskovich, counsel for defendant Jorge Rodriguez-Medina, that the preliminary hearing in the above-captioned case, currently scheduled for March 8, 2024, at 4:00 p.m., be vacated and continued until a time convenient to the Court, but no earlier than 30 days from the date of the filing of this stipulation.

1 This request requires that the Court extend two deadlines: (1) that a preliminary  
2 hearing be conducted within 14 days of a detained defendant's initial appearance, *see* Fed.  
3 R. Crim. P. 5.1(c); and (2) that an information or indictment be filed within 30 days of a  
4 defendant's arrest, *see* 18 U.S.C. § 3161(b).

5 This stipulation is entered into for the following reasons:

6 1. Federal Rule of Criminal Procedure Rule 5.1(d) provides that "[w]ith the  
7 defendant's consent and upon a showing of good cause—taking into account the public  
8 interest in the prompt disposition of criminal cases—a magistrate judge may extend the time  
9 limits [for preliminary hearings] one or more times." Here, the parties need additional time  
10 to consider whether the case can be resolved prior to indictment.

11 2. This continuance is not sought for the purposes of delay, but to allow the  
12 court an opportunity to examine the merits of this case before deciding whether to accept  
13 the parties' plea agreement.

14 3. Defendants are not in custody and agree to the continuance.

15 4. Denial of this request could result in a miscarriage of justice, and the ends of  
16 justice served by granting this request outweigh the best interest of the public and the  
17 defendants in a speedy trial.

18 5. The additional time requested by this stipulation is excludable in computing

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the time within which indictment must be filed pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(b), and considering the factors under 18 U.S.C. § 3161(h)(7)(A) and (B)(i) and (iv).

DATED this 29th day of February 2024.

Respectfully submitted,

JASON M. FRIERSON  
United States Attorney

/s/ LaRonda R. Martin  
LARONDA R. MARTIN  
Assistant Federal Public Defender  
*Counsel for Defendant Sanchez-Lobo*

/s/ Jean N. Ripley  
Jean N. Ripley  
Assistant United States Attorney  
*Counsel for the United States*

/s/ Robert Draskovich  
Robert Draskovich, Esq.  
*Counsel for Defendant Rodriguez-Medina*

**UNITED STATES DISTRICT COURT  
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**FINDINGS AND ORDER**

Based on the pending Stipulation between the defense and the government, and good cause appearing therefore, the Court hereby finds that:

1. The parties desire to continue the preliminary hearing to facilitate pre-indictment resolution. The Court finds good cause to continue the hearing to allow the court additional time to decide whether to accept the plea.

2. Both counsel for the defendants and counsel for the government agree to the continuance.

3. Defendants are not in custody and agree to the continuance.


4. The continuance is not sought for the purposes of delay, but to allow the parties to reach a potential resolution before the government moves forward with further prosecution.

5. Denial of this request could result in a miscarriage of justice, and the ends of justice served by granting this request outweigh the best interest of the public and the defendants in a speedy trial.

6. The additional time requested by this stipulation is excludable in computing the time within which indictment must be filed pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(b), and considering the factors under 18 U.S.C. § 3161(h)(7)(A) and (B)(i) and (iv).

THEREFORE, IT IS HEREBY ORDERED that the preliminary hearing in the above-captioned matter currently scheduled for March 8, 2024, at 4:00 p.m. be vacated and continued to April 8, 2024, at 3:00 p.m.

DATED this 5 day of March, 2024.

  
HONORABLE BRENDA WEKSLER  
UNITED STATES MAGISTRATE JUDGE